

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

PETER A. CHIEJINA, and
PICCOL NIGERIA LTD.,

Petitioners-Appellees,

v.

FEDERAL REPUBLIC OF NIGERIA,

Respondent-Appellant.

Case No. 22-7146

**NOT YET SCHEDULED
FOR ORAL ARGUMENT**

**JOINT NOTICE REGARDING SETTLEMENT NEGOTIATIONS AND
MOTION FOR EXTENSION OF BRIEFING SCHEDULE**

Respondent-Appellant the Federal Republic of Nigeria and Petitioners-Appellees Peter A. Chiejina and PICCOL Nigeria Ltd., by and through undersigned counsel, hereby notify the Court that the approval process for the settlement agreement reached in principle between the parties is ongoing, and respectfully request the Court further extend the remaining briefing deadlines established in its April 18, 2023 Order, such that the briefing schedule would be:

Appellant's Reply Brief

June 13, 2023
(14-day extension)

Deferred Appendix

June 19, 2023
(14-day extension)

The reasons for this request are as follows:

1. On January 11, 2023, the parties jointly submitted a notice to this Court of the ongoing settlement negotiations and requesting an extension of the briefing schedule. The very same day, the Clerk of Court issued an Order granting this extension. In accordance with the new schedule, Appellant submitted its opening brief on February 10, 2023, and Appellees filed their response brief on March 31, 2023. No oral arguments have yet been scheduled.

2. The parties reached a settlement agreement in principle on April 12, 2023. The terms of the settlement have largely been determined. For it to become final, however, the agreement requires approval by the Nigerian government. This is achieved through a process of coordination across multiple offices and agencies. Accordingly, on April 17, 2023, the parties filed a joint motion to extend the remaining briefing schedule by 30 days to allow this process to take its course. The Clerk of Court granted the motion on April 18, 2023.

3. The parties now respectfully request an additional extension of 14 days, as the settlement agreement continues to undergo the appropriate governmental review and consultation. Such an extension would allow the Nigerian government to focus its efforts on finalizing the settlement agreement and settling this dispute amicably.

Dated: May 23, 2023

Respectfully submitted,

/s/ Theodore J. Folkman

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CERTIFICATE OF COMPLIANCE

1. This notice and motion complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A) and D.C. Cir. R. 32(e)(1) because this motion contains 315 words, excluding the parts of the notice and motion exempted by Fed. R. App. P. 32(f).
2. This notice and motion complies with the typeface and type-style requirements of Fed. R. App. P. 27(d)(1)(E) because this motion has been prepared in a proportionally spaced typeface using Microsoft Word 2016 in 14-point Times New Roman font.

Dated: May 23, 2023

/s/ Tara M. Lee

Tara M. Lee (DC Bar No. 17902)